

EFFICACY REVIEW
by Mark Suarez, Entomologist - IB

DATE: 15 March 2005 (revised 31 March 2005)
Mark E. S.
31 March 2005

EPA REG. NUMBER: 73049-185

PRODUCT NAME: UltraTec HPC 2

REGISTRANT: Valent Biosciences Corp.

PM: George LaRocca, PM 13
REVIEWER: Olga Odiott

DECISION #.: 350278
DP BARCODE: 310349

ACTION: R34

ACTIVE INGREDIENT(S): 097805, Deltamethrin.....0.02%

TYPE: Crack and Crevice and Surface Spray

OPPTS GUIDELINE(S): 810.1000
810.3000
810.3400
810.3500

MRIDs: 45069302
45137603
42015413
44874702

GLP ?: No.

SITES: Indoor and Outdoor Premise

PESTS: German Cockroaches, Fleas, House Flies,
Mosquitoes that may transmit WNV Equine
Encephalitis, Carpenter Ants, Ticks that may
carry Lyme Disease, Stable Flies

STUDY APPLICATION RATE: Variable

LABEL APPLICATION RATE: Until damp.

STUDY SUMMARIES

The registrant has cited previously submitted and reviewed data in support of the subject registration. A synopsis of each review as it pertains to the subject registration follows.

MRID 45069302 reviewed by Vern McFarland (04/13/2000 and 07/10/2000) in support of 9 month German cockroach claim and 4 week residual and Cat flea control.

German Cockroaches:

The cited data indicate that the product is efficacious for up to nine months when applied to non-porous surfaces (e.g., ceramic tile); when applied to porous surfaces residual activity is limited to 3 months.

Fleas:

The claims desired are not supported by the data cited as per the original review.

MRID 45137603 reviewed by Vern McFarland (07/20/2000) in support of 5 month house fly claim and 4 month stable fly claim.

House Flies:

The data reviewed originally were deemed sufficient for a 4 week claim against house flies, not a 5 month claim. This reviewer finds a 5 month claim against house flies to be acceptable after re-evaluation of the original data presented in MRID 45137603.

Stable Flies:

The data reviewed originally were deemed sufficient for a 4 week claim against stable flies, not a 4 month claim. This reviewer finds a 4 month claim against stable flies to be acceptable after re-evaluation of the original data presented in MRID 45137603.

MRID 42015413 no review found in support of 4 week mosquito claim and control of mosquitoes that may carry West Nile Virus and Equine encephalitis.

The data submitted are not acceptable for the inclusion of claims against mosquitoes that carry WNV and Equine Encephalitis. The study provided data on only one species of mosquito, *Anopheles atroparvus*. The other "mosquito" species tested, *C. lectularius*, is in fact the bed bug. WNV and Equine Encephalitis claims require supporting data for at least two species of mosquito known to vector the diseases.

MRID 44874702 reviewed by Vern McFarland (08/31/1999) in support of 1 month Carpenter ant claim.

The data cited support a 4 week claim when applied to non-porous surfaces (e.g., vinyl tile), but do not support a residual claim when applied to porous surfaces.

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

A. The following claims are *acceptable, as noted*, based upon the studies cited:

1. 9 month German cockroach claim.

The data cited are not adequate for the support of a nine moth residual claim, because the product proved efficacious against the test species for only 3 months when applied to porous surfaces. However, the claim may be included on a conditional basis. To retain this claim the registrant must submit or cite corroborative data showing 9 month residual activity of the subject formulation when applied to unfinished plywood sheeting within one year.

2. 5 month house fly claim and 4 month stable fly claim.

House Flies:

The data reviewed originally were deemed sufficient for a 4 week claim against house flies, not a 5 month claim. This reviewer finds a 5 month claim against house flies to be acceptable after re-evaluation of the original data presented in MRID 45137603.

Stable Flies:

The data reviewed originally were deemed sufficient for a 4 week claim against stable flies, not a 4 month claim. This reviewer finds that a 4.5 month claim against stable flies to be acceptable after re-evaluation of the original data presented in MRID 45137603.

3. 4 week Carpenter ant claim.

The cited data support a claim of up to 4 weeks when applied to vinyl tile and no residual activity when applied to concrete block. Therefore, the inclusion of a 1 month claim should be approved conditionally, based upon the submission corroborating 30 day efficacy data for the subject formulation applied to unfinished plywood sheeting. These data are to be submitted to the Agency within one year.

4. The inclusion of a **bulleted marketing claims for carpenter ant/bee control** is acceptable, as these claims were previously approved (18 December 2002) for inclusion on the product label.

B. The registrant must submit or cite data for the inclusion of the following claims, which are *not acceptable* based upon the studies cited:

1. 4 week residual and controls claims against the cat flea, *Ctenocephalides felis*.

The claims desired are not supported by the data cited. As reflected in the original review and letter to Aventis Environmental Science dated 17 July 2000 [EPA Reg.# 73049-187]. Kills claims against fleas without residual claims may remain on the label.

2. 4 week mosquito claim and control of mosquitoes that may carry West Nile Virus and Equine encephalitis.

The data submitted are not acceptable for the inclusion of claims against mosquitoes that carry WNV and Equine Encephalitis. The study provided data on only one species of mosquito, *Anopheles atroparvus*. Submit or cite data against for the inclusion of residual claims and claims against mosquitoes that may transmit WNV or Equine Encephalitis.

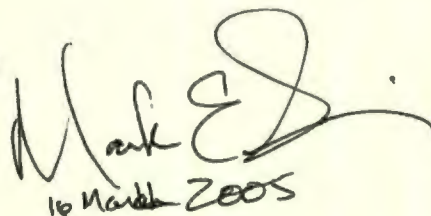
3. Control claims against ticks that may carry Lyme disease.

The submitted data do not support a control claim, but the claim "**Kills ticks**" may be remain on the label.

Enclosure
073049-00185-ER

See 3/31/05 revision

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STUDY APPLICATION RATE: Variable

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ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The registrant has cited previously submitted and reviewed data in support of the subject registration. A synopsis of each review as it pertains to the subject registration follows. The movement of tick and carpenter ant/bee claims is acceptable, if these claims were previously approved from inclusion on the subject label.

MRID 45069302 reviewed by Vern McFarland (04/13/2000 and 07/10/2000) in support of 9 month German cockroach claim and 4 week residual and Cat flea control.

German Cockroaches:

The registrant must specify that when applied to non-porous surfaces (e.g., ceramic tile) the product is efficacious for up to nine months. When applied to porous surfaces residual activity is limited to 3 months.

Fleas:

The claims desired are not supported by the data cited. Submit or cite data to include residual or control claims against fleas.

MRID 45137603 reviewed by Vern McFarland (07/20/2000) in support of 5 month house fly claim and 4 month stable fly claim.

House Flies:

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MRID 44874702 reviewed by Vern McFarland (08/31/1999) in support of 1 month Carpenter ant claim.

The registrant must specify that when applied to non-porous surfaces (e.g., ceramic tile) the product is efficacious for up to 4 weeks. When applied to porous surfaces no residual claims are permitted.